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July 17, 2012

VIA ECF

Honorable Kiyo A. Matsumoto
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

RE: US. v. BALZANO
Docket # 11 CR 32 (KAM)

Dear Honorable Madam:

Please accept this letter to request that your Honor modify the Defendant's bail conditions to permit him to travel away from his home in Narrowsburg, New York.

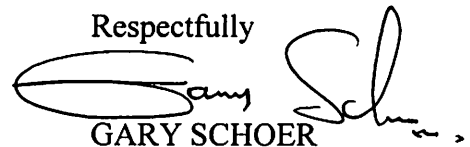
Mr. Balzano requests permission to travel with his wife for a two day outdoor family reunion event which will be held at the Bob Landers River Trip, 5961 New York 97, Narrowsburg, New York to be held on July 28th and July 29th 2012. He will leave his home around 10:00 a.m. and will return home on or before 5:00 p.m. on each day.

I have conveyed this request to Pretrial Services Officer Leo Barrios and he has no objection. I have also left a message for AUSA Allon Lifshitz who has been on trial since June 4, 2012 and AUSA Elizabeth Geddes who is currently out of the office for several weeks and have not, as yet, received any response from either. In the past, the Government has indicated that it has no objection to similar requests.

If additional information is needed, please do not hesitate to contact me.

Thank you in advance for your consideration of this matter.

Respectfully


GARY SCHOER

GS/tm

cc: Allon Lifshitz, AUSA & Elizabeth Geddes, AUSA
Leo Barrios, (U.S. Pretrial Services Officer)